Luke T. Russell

National Legislative Issues Coordinator

University of Missouri Graduate and Professional Council

Columbia, MO

Background: The University of Missouri Graduate Professional Council is the official student government for all graduate, professional, and post-baccalaureate students at the University of Missouri (MU) in Columbia, Missouri. Since 1982, it has represented all the departments of the Graduate School and the schools of Business, Public Affairs (previously Public Administration), Law, Medicine and Veterinary Medicine. In total, GPC represents approximately 7,800 graduate and professional students who will compose the next generation of lawyers, doctors, researchers, entrepreneurs, innovators, and business leaders both in Missouri and across the United States.

The University of Missouri Graduate and Professional Council is a strong supporter of public access policies because we believe that our future as academics, professionals, and citizens is strongly interrelated to the dissemination of information via the Internet and the right to access such information. Graduate and professional students at the University of Missouri currently do not have access to all the scholarly research they need to pursue their education, research, and career goals.

Comment 1: Are there steps that agencies could take to grow existing and new markets related to the access and analysis of peer-reviewed publications that result from federally funded scientific research? How can policies for archiving publications and making them publically accessible be used to grow the economy and improve the

productivity of the scientific enterprise? What are the relative costs and benefits of such policies? What type of access to these publications is required to maximize U.S. economic growth and improve the productivity of the American scientific enterprise?

Many graduate and professional students at the University of Missouri are already funded by federal dollars either directly through federal loans, or indirectly through USDA, NSF, NIH, or other federal agency grants. The skills and talents that our graduate and professional students develop are reliant upon having access to the most recent and up-to-date knowledge generated in their field.

Without access to the most up to date research the state-of-the art skills and training that both the federal government and state of Missouri have invested in may be dulled. This is an especially likely outcome given the currently poor state of the United States economy and job market. Expanding the public's access to cutting-edge research will help graduate and professional students to keep their skills honed and allow them to develop new innovations and industries both while they are still students, and after graduation. It is today's graduate and professional students in the humanities, arts, biological/health sciences, social sciences, engineering and computer sciences that will develop and found the Fortune 500 companies of the next century. Open access can help these new job-creators and job-holders to get their ideas and companies into the marketplace.

Comment 2: What specific steps can be taken to protect the intellectual property interests of publishers, scientists, Federal agencies, and other stakeholders involved with the publication and dissemination of peer-reviewed scholarly publications resulting from federally funded scientific research? Conversely, are there policies that should not be adopted with respect to public access to peer-reviewed scholarly publications so as not to undermine any intellectual property rights of publishers, scientists, Federal agencies, and other stakeholders?

Many publicly funded publications are already available freely in University repositories, where faculty may be encouraged to store pre-published versions of their manuscripts, or on federal agency and personal websites. The University of Missouri has contributed a sizable body of published research articles to the NIH PubMed collection. Developing an open-access policy could move these databases and archives to a more easily searchable and centralized location similar to the current PubMed and Google scholar databases.

Developing such a database without infringing on copyright could best be accomplished by ensuring that federally funded research be required to publish their findings through appropriate Creative Commons CC-BY licenses. High impact journals will always have the need and desire to publish high quality articles and research in order to keep their journals relevant. Researchers

and scientists will continue to maintain their need to publish in high impact journals in order to remain relevant in their fields and ensure their knowledge is widely disseminated. Requiring the use of Creative Common CC-BY licenses would allow publishers and scientists to continue to publish the highest quality articles in the highest impact academic journals while still allowing for appropriate and legal dissemination of these works.

Comment 3: What are the pros and cons of centralized and decentralized approaches to managing public access to peer-reviewed scholarly publications that result from federally funded research in terms of interoperability, search, development of analytic tools, and other scientific and commercial opportunities? Are there reasons why a Federal agency (or agencies) should maintain custody of all published content, and are there ways that the government can ensure long-term stewardship if content is distributed across multiple private sources?

and

Comment 4: Are there models or new ideas for public-private partnerships that take advantage of existing publisher archives and encourage innovation in accessibility and interoperability, while ensuring long-term stewardship of the results of federally funded research?

Long-term stewardship would be best guaranteed by the hosting of databases by government agencies. The NSF, NIH, USDA, and other government institutions are the most appropriate steward to ensure that publicly funded articles are permanently preserved, and made both accessible and usable by the general public. The hosting of such articles in a centralized database would best enable innovative companies and individuals to develop new services and companies. In order to accomplish this wide availability - approved repositories that meet conditions for public accessibility, use rights, interoperability, and long-term preservation of articles could be maintained by third-parties and innovative public/private partnerships.

Comment 8: What is the appropriate embargo period after publication before the public is granted free access to the full content of peer-reviewed scholarly publications resulting from federally funded research? Please describe the empirical basis for the recommended embargo period. Analyses that weigh public and private benefits and account for external market factors, such as competition, price changes, library budgets, and other factors, will be particularly useful. Are there evidence-based arguments that can be made that the delay period should be different for specific disciplines or types of publications?

Ideally, the sooner students can have access to the most recent peer reviewed research and publications the more likely they will be able to push their fields even further as they develop new technologies and innovations in their final projects, theses, and dissertations. The average semester lasts roughly 4 months, and an embargo could result in replication of old projects, rather than the continuous growth and development that could have occurred had such information been previously available.

With that in mind, a hard stop date between 0-12 months would likely be the most appropriate compromise. Journals in a wide variety of disciplines, ranging from the American Heart Association, to the Journal of Social Cognition and Affective Neuroscience already allow for their works to become publically available within a year after publication through services such as those on highwire.standford.edu without seeing harmful affects on publishers bottom-line.

Open access will be key to creating a more informed, innovative, and prosperous American society and the University of Missouri Graduate and Professional Council strongly encourages the adoption of a wide-ranging federal policy for allowing open access to publically funded research.

Sincerely,

Luke T. Russell GPC - National Issues Coordinator University of Missouri-Columbia